

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
SOUTHERN DIVISION

No. 7:16-CR-122-7BO

UNITED STATES OF AMERICA	:	
	:	
v.	:	DEFENDANT’S SENTENCING
	:	MEMORANDUM
AARON RICHARDSON	:	

Defendant, Aaron Richardson, asks this Court to impose a sentence of no more than 18 months in prison, to be followed by a term of supervised release. Such a sentence is sufficient, but not greater than necessary, to comply with the purposes set forth in 18 U.S.C. § 3553(a)(2).

Had the case gone to trial, the evidence would have established that Mr. Richardson was a canine breeder who moved to North Carolina from Florida approximately eleven months before his arrest on December 6, 2016. During that time, he stayed with Lewis Andrews and, beginning in mid-September 2016, Ronnie Thompson. Thompson and Richardson were jointly responsible for possessing the 32 canines on their property at 150 Porters Ridge Road in Jacksonville.

Unlike Andrews and Thompson, Mr. Richardson did not train any dogs for fighting, fight any dogs, or promote or sponsor a dogfighting event. He did, however, attend two fights as a spectator. The evidence at trial would have shown that Mr. Richardson was attempting to establish his own kennel and bloodline based on the success and advice of other breeders such as Bobby Hall in Oklahoma. There is no evidence, however, that Mr. Richardson did more than acquire a number of dogs and begin to breed them. Of the 32 canines on the property, 12 were puppies less than 16 weeks old.

Six of Mr. Richardson's family members have written character letters to this Court. In nearly all of the letters, the writers have described him as a person who has loved dogs all of his life and who would never intentionally harm an animal. The cruel and callous aspects of dogfighting described in the PSR are antithetical to Mr. Richardson's personality. Amy Richardson wrote that, "[i]n a perfect world," her son might have "become one of the best [v]eterinarians in our country." If anything, he would have been the defendant most inclined to render aid to a dog injured in a fight, and it was heartbreaking to watch his reaction when he learned that most of his dogs had been euthanized.

Unlike other defendants who won large sums of money fighting their dogs, Mr. Richardson was financially destitute and dependent upon others for support. He had no cash or assets of any value when he was arrested, and living conditions inside the trailer where he stayed were squalid.

Mr. Richardson does not pose a danger to the public that cannot be mitigated by post-release supervision. He will not be allowed to possess pit bulls. He will be monitored for drug use. He has been drug-free since his arrest nearly a year ago, and he intends to take advantage of opportunities for substance abuse treatment and education in the Bureau of Prisons. His conditions of release will prohibit him from further criminal conduct and possession of firearms. Violations will place him at risk of additional incarceration. These are strong incentives to remain law-abiding.

Moreover, Mr. Richardson understands the consequences of his past actions and is resolved to set a different course for his life. His mother plans to pay six months' worth of rent on a small apartment while he works to establish a lawn care business in Onslow County. The current period of incarceration has taken a toll on him emotionally. He recognizes that he needs

to get on his feet quickly to be able to meet his outstanding child support and restitution obligations. He does not wish to have any further interactions with the criminal justice system.

WHEREFORE, Mr. Richardson asks this Court to impose a Guidelines sentence of not more than 18 months in prison.

Respectfully submitted this 27th day of November 2017.

/s/ Sean P. Vitrano

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Appointed

**CERTIFICATE OF SERVICE**

I hereby certify that on November 27, 2017, I filed the foregoing motion with the Clerk of Court electronically using the CM/ECF system, which will send notification of such filing to counsel for the Government, Assistant United States Attorney Laura S. Howard.

/s/ Sean P. Vitrano

Sean P. Vitrano